

Presented to the Court by the foreman of the
Grand Jury in open Court, in the presence of
the Grand Jury and FILED in the U.S.
DISTRICT COURT at Seattle, Washington.

September 20 2017
WILLIAM M. McCOOL, Clerk
By [Signature] Deputy

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

JESUS OCTAVIO RODRIGUEZ-PAYAN,
a/k/a "Tavo," "Tavito,"

Defendant.

NO

CR17-233-RAJ

INDICTMENT

The Grand Jury charges that:

COUNT 1

(Conspiracy to Distribute Controlled Substances)

Beginning at a time unknown, but within the past five years, and continuing until
on or about September 20, 2017, in King and Snohomish Counties, within the Western
District of Washington, and elsewhere, JESUS OCTAVIO RODRIGUEZ-PAYAN and
others known and unknown, did knowingly and intentionally conspire to distribute
substances controlled under Title 21, United States Code, Section 812, Schedules I and II,
including heroin and methamphetamine, contrary to the provisions of Title 21, United
States Code, Sections 841(a)(1).

Specific Quantity Allegations as to Heroin

With respect to Defendant JESUS OCTAVIO RODRIGUEZ-PAYAN, his conduct as a member of the conspiracy charged in Count 1, which includes the reasonably foreseeable conduct of other members of the conspiracy charged in Count 1, involved one kilogram or more of a substance containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(b)(1)(A).

Specific Quantity Allegations as to Methamphetamine

With respect to Defendant JESUS OCTAVIO RODRIGUEZ-PAYAN, his conduct as a member of the conspiracy charged in Count 1, which includes the reasonably foreseeable conduct of other members of the conspiracy charged in Count 1, involved 50 grams or more of actual methamphetamine, and/or 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, in violation of Title 21, United States Code, Section 841(b)(1)(A).

All in violation of Title 21, United States Code, Section 846.

ASSET FORFEITURE ALLEGATION

Conspiracy to Distribute Controlled Substances

The allegations contained in Count 1 of this Indictment are hereby realleged and incorporated by reference for purpose of alleging forfeitures pursuant to Title 21, United States Code, Section 853.

Upon conviction of the offenses alleged in Count 1 of the Indictment, the Defendant JESUS OCTAVIO RODRIGUEZ-PAYAN shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offenses, and also shall forfeit any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses.

Substitute Assets

If any of the above described forfeitable property, as a result of any act or omission of the Defendant,

1. cannot be located upon the exercise of due diligence;
2. has been transferred or sold to, or deposited with, a third party;
3. has been placed beyond the jurisdiction of the Court;
4. has been substantially diminished in value; or
5. has been commingled with other property which cannot be divided without difficulty;

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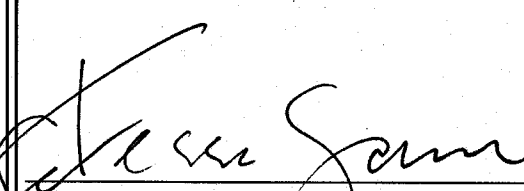
1 it is the intent of the United States, pursuant to Title 21, United States Code, Section
2 853(p), to seek the forfeiture of any other property of the Defendants up to the value of
3 the above-described forfeitable property.
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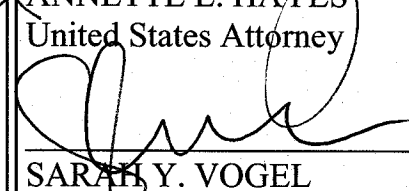
6 A TRUE BILL:


7 DATED: 9.20.17
8

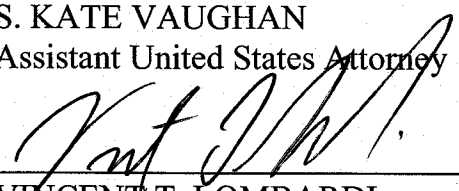
9 *Signature redacted per policy*

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11 _____
12 FOREPERSON

13 
14 ANNETTE L. HAYES
15 United States Attorney

16 
17 SARAH Y. VOGEL
18 Assistant United States Attorney

19 
20 S. KATE VAUGHAN
21 Assistant United States Attorney

22 
23 VINCENT T. LOMBARDI
24 Assistant United States Attorney
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